

Air Quality
Action Partners
(AQAPs) Updates

Air Pollution Control District May 19, 2021



MPSG Recommendations

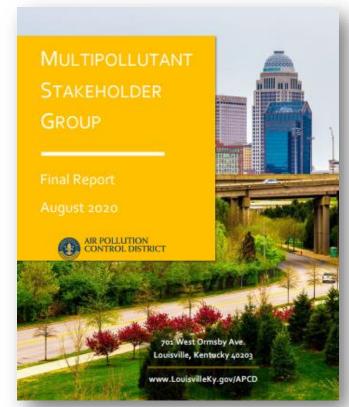
4. The District should encourage action by Point Sources on Air Quality Alert Days.

a) The District should ensure that environmental contacts for permitted sources

are directly notified by email of Air Quality Alert Days.

b) The Committee also recommends sources have an Air Quality Alert Day Plan, which voluntarily commits to avoiding, deferring, or delaying certain actions such as startups, shutdowns, maintenance, and testing on Air Quality Alert Days whenever possible.

The District should recognize companies which submit Air Quality Alert Day Plans, including through the recognition program in Recommendation 2.





MPSG Recommendations

2. The District should start a program to recognize companies for voluntary efforts to reduce ozone precursor and other emissions. Recognition should be given through certificates or badges for different levels or tiers of reductions, awarded before the Louisville Metro Air Pollution Control Board.



3. The District should encourage participation by sources in voluntary programs such as KY EXCEL, Kentucky Pollution Prevention Center, and the Louisville Metro Energy Project Assessment District (EPAD) program, including through the recognition program in recommendation 2.



Air Quality Action Partners (AQAPs)



GREG FISCHER MAYOR RACHAEL HAMILTON INTERIM DIRECTOR

March 31, 2021

«AddressBlock»

«GreetingLine»

The Louisville Metro Air Pollution Control District ("District") invites you to join us in our efforts to continue to reduce ambient air pollution in Louisville. As part of our ongoing work to engage our entire community around reducing the health impacts of air pollution, the District hosted the Multipollutant Stakeholder Group (MPSG) last year to gather recommendations from partners in industry and other community organizations. One of the highlighted recommendations from the Point Source Committee of the MPSG was that the District should "encourage action by Point Sources on Air Quality Alert Days," when air pollution levels for ozone or fine particulate matter (PM 2.5) are forecasted to exceed national health-based standards, and that point sources should "have an Air Quality Alert Day Plan"

To that end, we have created a list of suggested actions the District encourages your company to include in an Air Quality Alert Day Plan to assist in avoiding exceedances of the National Ambient Air Quality Standards (NAAQS) and to improve Louisville's air quality. This list is posted for download on our website. These actions are entirely voluntary, however, to encourage our industry partners to assist the District, the District is looking to recognize companies that voluntarily commit to these strategies or others, by downloading and returning a completed copy of the form to Byron Gary@LouisvilleKv.gov by April 30, 2021. Companies that commit to voluntary strategies to reduce ambient pollution will be publicly recognized on our website as our First Year Air Quality Action (AQA) Partners. Furthermore, gold level or above AQA Partners will be recognized before the Louisville Metro Air Pollution Control Board in May for their commitments.

Please contact our Regulatory Coordinator, Byron Gary@LouisvilleKy.gov or (502) 574-7253 if you have any questions.

Sincerely.

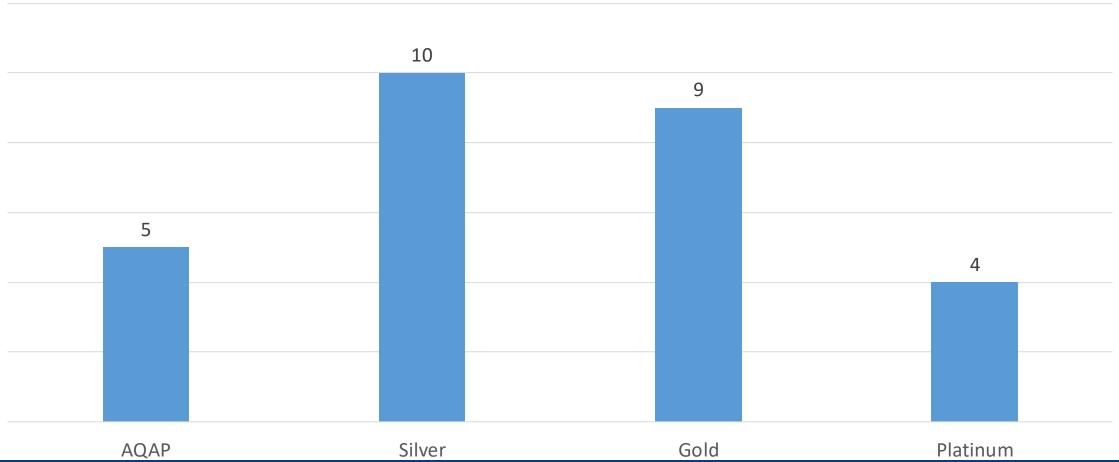
Rachael Hamilton Interim Director

- Invitation sent March 31
- Respond by April 30
- Sent to 703 contacts at 401 plants
- Received 28 signups
- https://louisvilleky.gov/government/airpollution-control-district/air-qualityaction-partners-program



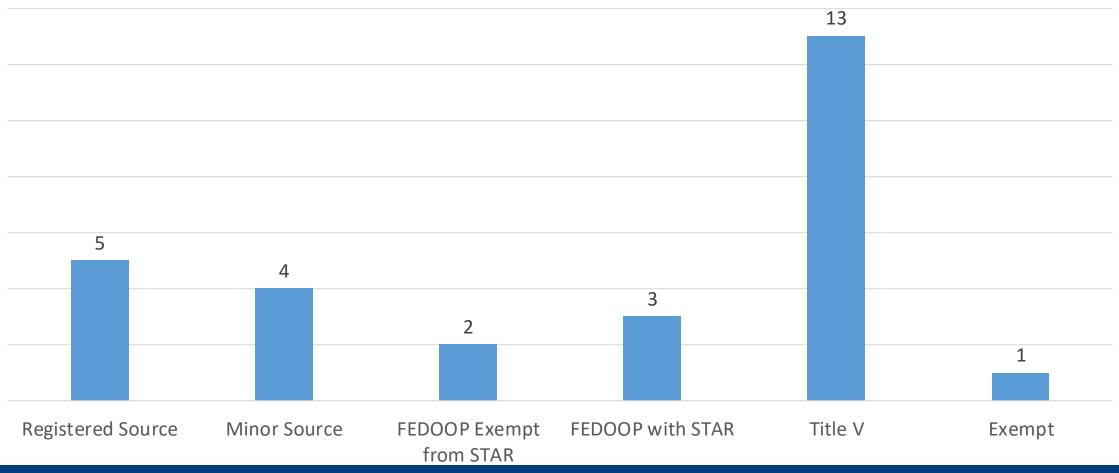
WWWLOUISVILLEKY.GOV
WWWLOUISVILLEKY.GOV/APCD 701 WEST ORAISBY AVENUE SUITE 303 LOUISVILLE, KENTUCKY 40203-3137

AQAPs by Levels



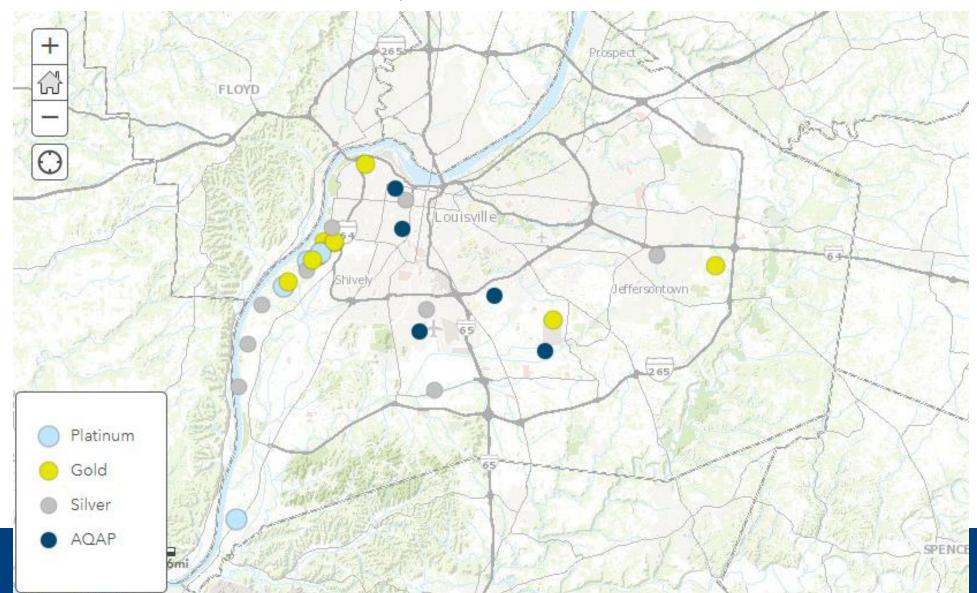


AQAPs by Permit Class





AQAPs Locations





AQAPs Levels

 AQAPs - Tier 1 Commitments (AQA alerts received and distributed) along with at least two (2) Tier 2 or above commitments



- Silver Level at least one commitment from each of the Tier 2 categories
 - Stationary Source Equipment Operations & Emissions
 - Vehicle & Fleet Emissions
 - Facility & Building-Related Emissions





AQAPs

- Reading Equipment & Distribution, LLC
- IMI Kentucky, LLC
- Clark & Riggs Printing
- Dawn Foods Louisville Manufacturing
- Hoffman Trailer Company, Inc.





Silver Level

Q A a

- Valicor Environmental Services
- LG&E Cane Run Generating Station
- Texas Gas Jeffersontown Compressor Station
- Jefferson County Public Schools
- Allnex USA, Inc.
- MPLX Terminals LLC Algonquin Terminal
- MPLX Terminals LLC Kramers Terminal
- Marathon Petroleum Company Cane Run
- Republic Conduit Manufacturing
- Kelvin Cooperage



AQAPs Levels (cont'd)

- Gold Level
 - at least one commitment from each of the Tier 2 categories, and
 - pledge to quantify emissions reductions under Tier 3
- Platinum Level
 - at least one commitment from each of the Tier 2 categories, pledge to quantify their emissions reductions under Tier 3 plus any additional Tier 3 commitment, or
 - both Tier 1 commitments and overall reduction of 10% of emissions under one of the Tier 3 commitments.







Gold Level - Arkema

- Reschedule discretionary emission-generating activities such as
 maintenance and testing to avoid emissions on Air Quality Alert Days
- Establish and enforce idling restriction policies for use of organization's vehicles, equipment, and property
- Defer mowing and groundskeeping activities on Air Quality Alert Days



Gold Level - Atkemix Ten, Inc.



- Establish low-emissions purchasing policies for stationary equipment
- Optimize combustion and pollution controls for emissions reductions, particularly on Air Quality Alert Days
- Establish and enforce idling restriction policies for use of organization's vehicles, equipment, and property
- Establish fleet management policies that prioritize the use of vehicles and equipment with low NOX emission rates
- Educate fleet users on driving and equipment operation practices that can reduce emissions
- Take actions to conserve energy on Air Quality Alert Days
- Get a Pollution Prevention (P2) or Energy Efficiency (E2) Assessment from the Kentucky Pollution Prevention Center and implement a reduction strategy.
- Defer mowing and groundskeeping activities on Air Quality Alert Days
- Establish low-emissions purchasing policies for new non-road mobile sources (such as groundskeeping equipment, construction equipment, etc.)



Gold Level - BASF Corporation



- Use alternative solvents with reduced VOC content.
- Establish and enforce idling restriction policies for use of organization's vehicles, equipment, and property
- Establish policy requiring use of products from the EPA Safer Choice List for non-industrial process cleaning



Gold Level - Carbide Industries, LLC

- Reschedule discretionary emission-generating activities such as maintenance and testing to avoid emissions on Air Quality Alert Days
- Educate fleet users on driving and equipment operation practices that can reduce emissions
- Defer mowing and groundskeeping activities on Air Quality Alert Days



Gold Level – Eaton Corporation

- Reschedule discretionary emission-generating activities such as maintenance and testing to avoid emissions on Air Quality Alert Days
- Educate fleet users on driving and equipment operation practices that can reduce emissions
- Take actions to conserve energy on Air Quality Alert Days



Gold Level – GE Appliances, a Haier Company

- Q A A
- Establish and enforce solvent management best practices
- Utilize powder coatings instead of wet paint to reduce VOC emissions
- Educate fleet users on driving and equipment operation practices that can reduce emissions
- Communicate available resources (e.g. KAIRE, Mower Rebates to employees)
- Obtain (or maintain) LEED certification for your building or facility
- Defer mowing and groundskeeping activities on Air Quality Alert Days



Gold Level – Lubrizol Advanced Materials, Inc.



- Reduce steam usage by recycling G-Line centrate to heat reslurry water.
- Establish and enforce idling restriction policies for use of organization's vehicles, equipment, and property
- Switch generator auto-exercise from 8 am to evening/night.



Gold Level – The Chemours Company FC, LLC



- Optimize combustion and pollution controls for emissions reductions, particularly on Air Quality Alert Days
- Establish and enforce idling restriction policies for use of organization's vehicles, equipment, and property
- Defer mowing and groundskeeping activities on Air Quality Alert Days



Gold Level – Zeon Chemicals L.P.

- Reschedule discretionary emission-generating activities such
 as maintenance and testing to avoid emissions on Air Quality Alert Days
- Encourage employees who are able, to telecommute at least once a week and on all Air Quality Alert Days
- Defer mowing and groundskeeping activities on Air Quality Alert Days



Platinum Level – American Synthetic Rubber Company



- Optimize combustion and pollution controls for emissions reductions, particularly on Air Quality Alert Days
- Bicycles and battery-operated forklifts are used within the plant
- Defer mowing and groundskeeping activities on Air Quality Alert Days
- Installing low- NO_X burners on three new gas boilers to replace existing gas and coal boilers
- Commit to reduce annual facility-wide emissions of fine particulate matter (PM $_{2.5}$) at least 10%
- Commit to reduce annual facility-wide emissions of NO_x at least 10%



Platinum Level – Eckart America

- Establish & enforce solvent management best practices (will document and re-emphasize best management practices employed at this facility with >200,000 gallons solvent in use onsite)
- Establish & enforce idling restriction policies for vehicles & equipment onsite
- Defer building maintenance & construction activities such as paving, roofing, etc, on AQA days
- Commit to reduce annual facility-wide emissions of $PM_{2.5}$ by >10% through installation & start-up of voluntary add-on Atomization Dept filtration systems (projected to go online Q3 this year)



Platinum Level – Hexion Inc.

- Reschedule discretionary emission-generating activities such as maintenance and testing το Δνοίδι emissions on Air Quality Alert Days
- Install a variable frequency drive cool tower pump to decrease energy consumption.
- Implement a project to improve steam efficiency and decrease CH4 use
- Establish and enforce idling restriction policies for use of organization's vehicles, equipment, and property
- Establish low-emissions purchasing policies for new on-road vehicles
- Defer mowing and groundskeeping activities on Air Quality Alert Days
- Establish low-emissions purchasing policies for new non-road mobile sources (such as groundskeeping equipment, construction equipment, etc.)
- Defer building maintenance and construction activities (such as paving, roofing, etc.) on Air Quality
 Alert Days
- Commit to install diesel retrofits on at least 5% of local on-road or non-road equipment in the next year



Platinum Level – LG&E Mill Creek Generating Station



- Optimize combustion and pollution controls for emissions reductions, particularly on Air Quality Alert Days
- Electrifying 10% of company's fleet by 2030
- Take actions to conserve energy on Air Quality Alert Days
- Commit to reduce ozone season emissions of nitrogen oxides (NO_X) at least 5%



Next Steps

- Annual updates to checklist
- Ongoing invitation to join
- Gold & Platinum Level AQAPs
 - Quantify emissions reductions, either year-over-year or avoided specifically on Air Quality Alert Days, resulting from voluntary commitments and report out on these at the end of the program's first year (i.e., by April 15, 2022)
 - Recognized before the Louisville Metro Air Pollution Control Board



Questions?



Louisville Metro Air Pollution Control District

701 W. Ormsby Ave. Ste. 303 Louisville, KY 40203 (502) 574-6000 www.louisvilleky.gov/APCD

https://louisvilleky.gov/government/air-pollution-control-district/air-quality-action-partners-program

